

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	CASE NO.
UTILITIES COMPANY FOR AN ADJUSTMENT OF)	2018-00294
ITS ELECTRIC RATES)	

COMMISSION STAFF'S POST-HEARING REQUEST FOR INFORMATION
TO KENTUCKY UTILITIES COMPANY

Kentucky Utilities Company (KU), pursuant to 807 KAR 5:001, is to file with the Commission the original and an electronic version of the following information. The information requested herein is due on or before March 20, 2019. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Electronic documents shall be in portable document format (PDF), shall be searchable and shall be appropriately bookmarked.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KU shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KU fails or

refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, KU shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to KU's P.S.C. No. 18, Original Sheet No. 40.2 and proposed P.S.C. No. 19, Original Sheet No. 40.3. The original tariff language includes in the definition of telecommunications carrier "internet service providers, voice over internet protocol service providers, cellular and mobile phone service providers or resellers of such services." The proposed tariff removes this language. Explain why the language at the end of the definition of telecommunications carrier was removed.

2. Refer to KU's proposed P.S.C. No. 19, Original Sheet No. 40.4. Under the "Terms and Conditions of Attachment" section, numbered paragraph "1. Contract for Attachment to Company Structures," it states that "No Attachments shall be made to Company's Structures until Attachment Customer has executed a Contract for Attachment to Company Structures, in a form substantially similar to that which is included at the end of this Schedule." There does not appear to be a "Contract for Attachment to Company's Structures"-related form at the end of the Schedules. Provide the location in the Schedules where the subject form can be located. If the form is not currently in the proposed tariff, provide a copy of the form.

3. Refer to KU's P.S.C. No. 18, Original Sheet No. 57 and proposed P.S.C. No. 19, Original Sheet No. 57. The language of the original tariff under the second paragraph of the "Metering and Billing" section provides: "If Customer takes service under time-of-use or time-of-day rate schedule, Company will apply billing-period credits Customer creates in a particular time-of-day or time-of-use block only to offset net energy consumption in the same time-of-day or time-of-use blocks **in future billing periods.**" (Emphasis added). The proposed tariff removes the phrase "in future billing periods." Explain this change.

4. Refer to Louisville Gas and Electric Company's (LG&E) P.S.C. Electric No. 11, First Revision of Original Sheet No. 106.4 and proposed P.S.C. Electric No. 12, Original Sheet No. 106.4. Also, refer to KU's P.S.C. No. 18, First Revision of Original Sheet No. 106.4 and proposed P.S.C. No. 19, Original Sheet No. 106.4. The LG&E tariff deleted certain language contained in numbered paragraphs 3 and 4 under the Medium Density Subdivisions subsection relating to advancements and refunds. Explain why these same deletions were not proposed in KU's tariff.

5. Refer to LG&E's P.S.C. Electric No. 11, First Revision of Original Sheet No. 106.4, P.S.C. Electric No. 11, Original Sheet No. 106.5, and proposed P.S.C. Electric No. 12, Original Sheet No. 106.4. Also, refer to KU's P.S.C. No. 18, First Revision of Original Sheet No. 106.4, P.S.C. No. 18, Original Sheet No. 106.5, proposed P.S.C. No. 19, Original Sheet No. 106.4, and proposed P.S.C. No. 19, Original Sheet No. 106.5. The LG&E Tariff deleted certain language contained in numbered paragraphs 2 and 3 under LG&E's High Density Subdivisions subsection relating to advancements for required

trenching and backfilling. Explain why these same deletions were not proposed in KU's tariff.

6. Refer to KUs response to Staff's Fourth Request for Information, Item 11(a), relating to the proposed revisions to KU's overhead line extensions beyond 1,000 feet. If the Commission were to accept KU's proposal to delay line extension refunds until closer to the ten-year expiration date, indicate whether the refunds would include interest, and if so, indicate how the interest component would be calculated.

7. Refer to KU's response to Staff's Fourth Request for Information, Item 11(b), relating to proposed revisions to KU's overhead line extensions beyond 1,000 feet.

a. Indicate how many active electric customer extension contracts in excess of 1,000 feet KU has.

b. Of the active extension contracts, indicate how many have required refunds be issued during the last year.

c. Indicate the average amount of those refunds.

d. Indicate how many employees are involved in the refund process.

e. On average, indicate how long it takes to process one such refund.

8. Provide updated versions of the following exhibits in the Direct Testimony of Steven Seelye in Excel format:

a. WSS-4, Cost Support for LED Fixtures and Underground Poles

b. WSS-5, Cost Support for LED Conversion Fee

c. WSS-6, Cost Support for Solar Share Capacity Charges

d. WSS-7, Cost Support for Electric Vehicle Supply Equipment Rate

Rider

- e. WSS-15, Cost Support for Excess Facilities Rider
- f. WSS-17, Cost Support for Electric Meter Pulse Charge

9. Provide a copy of any agreements or memorandum of understanding between KU and low-income agencies setting forth how data relating to eligible customer participants in low-income utility assistance is collected and shared between the low-income agencies and KU.

10. Provide a revised Exhibit J in support of the stipulation.

11. Refer to KU's February 25, 2019 Supplemental Response to Staff's Fourth Request for Information, Item 2.

a. Explain the bases for the increase in total operating expense for line locations from 2015 to the base period, including the extent to which and why each basis resulted in an increase in cost.

b. Explain any change in the cost of contractors from 2017 to the base period, including the amount by which the change in contractors increased the cost of each line location, when the change occurred, and any difference in contractor costs between KU and LG&E.

c. Provide the amount of the operating expense shown in KU's February 25, 2019 Supplemental Response that KU attributes to work identifying lines to permit MetroNet to construct its network in 2017 and 2018 (if amounts or any portions thereof were projected, include any amounts that were projected as a result of anticipated costs related to MetroNet's network).

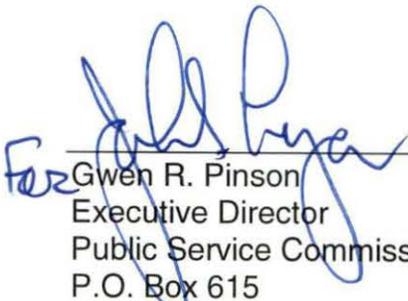
d. Provide the amount of the operating expense shown in KU's February 25, 2019 Supplemental Response that KU attributes to work identifying lines to

permit other major infrastructure projects to proceed in 2017 and 2018 (if amounts or any portions thereof were projected, include any amounts that were projected).

e. If KU contends that any increase in operating expense was the result of a backlog in requests for line locations, state whether that backlog has been cleared and, if not, when KU expects it to be cleared; and explain why KU contends that operating expenses arising from clearing a backlog in line location requests should be included in the revenue requirement when setting base rates.

f. If the operating expenses for line locations in the base period are projected, provide the actual expenses.

g. Explain how KU projected its operating expenses for line locations from the base period to the test period.


Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED MAR 11 2019

cc: Parties of Record

*Allyson K Sturgeon
Senior Corporate Counsel
Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

*Emily W Medlyn
General Attorney
U.S. Army Legal Services Agency Regul
9275 Gunston Road
Fort Belvoir, VIRGINIA 22060

*Honorable Kendrick R Riggs
Attorney at Law
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W Jefferson Street
Louisville, KENTUCKY 40202-2828

*Iris G Skidmore
Bates & Skidmore
415 W. Main Street
Suite 2
Frankfort, KENTUCKY 40601

*G. Houston Parrish
Labor Law Attorney
Office of the Staff Judge Advocate, B
50 3rd Avenue
Fort Knox, KENTUCKY 40121

*Kent Chandler
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*William H May, III
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

*Hannah Wigger
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*Larry Cook
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Barry Alan Naum
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Laurence J Zielke
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KENTUCKY 40202

*Carrie H Grundmann
Spilman Thomas & Battle, PLLC
110 Oakwood Drive, Suite 500
Winston-Salem, NORTH CAROLINA 27103

*Janice Theriot
Zielke Law Firm PLLC
1250 Meidinger Tower
462 South Fourth Avenue
Louisville, KENTUCKY 40202

*Matthew Miller
Sierra Club
50 F Street, NW, Eighth Floor
Washington, DISTRICT OF COLUMBIA 20001

*Carrie M Harris
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Justin M. McNeil
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Mark E Heath
Spilman Thomas & Battle, PLLC
300 Kanawha Blvd, East
Charleston, WEST VIRGINIA 25301

*Don C A Parker
Spilman Thomas & Battle, PLLC
1100 Brent Creek Blvd., Suite 101
Mechanicsburg, PENNSYLVANIA 17050

*Honorable Kurt J Boehm
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Honorable Michael L Kurtz
Attorney at Law
Boehm, Kurtz & Lowry
36 East Seventh Street
Suite 1510
Cincinnati, OHIO 45202

*Honorable Matthew R Malone
Attorney at Law
Hurt, Deckard & May
The Equus Building
127 West Main Street
Lexington, KENTUCKY 40507

*Tony Mendoza
Staff Attorney
Sierra Club Environmental Law Program
2101 Webster Street
Suite 1300
Oakland, CALIFORNIA 94612

*Paul Werner
Sheppard Mullin Richter & Hampton LLP
2099 Pennsylvania Avenue NW, Suite 1
Washington, DISTRICT OF COLUMBIA 20006

*M. Todd Osterloh
Sturgill, Turner, Barker & Moloney, PLLC
333 West Vine Street
Suite 1400
Lexington, KENTUCKY 40507

*Rebecca W Goodman
Assistant Attorney General
Office of the Attorney General Office of Rate
700 Capitol Avenue
Suite 20
Frankfort, KENTUCKY 40601-8204

*Honorable Robert C Moore
Attorney At Law
Stites & Harbison
421 West Main Street
P. O. Box 634
Frankfort, KENTUCKY 40602-0634

*Robert M Conroy
Director, Rates
Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40202

*Kentucky Utilities Company
220 W. Main Street
P. O. Box 32010
Louisville, KY 40232-2010

*Terrance A Spann
U.S. Army Legal Services Agency
9275 Gunston Road
ATTN: JALS-RL/IP
Fort Belvoir, VIRGINIA 22060-554